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10	Tel: (650) 331-2000 / Fax (650) 331-2060				
11	Attorneys for Plaintiff Twitter, Inc.				
12	UNITED STATES DISTRICT COURT				
13	NORTHERN DISTRICT OF CALIFORNIA				
14	OAKLAND	DIVISION			
15	TWITTER, INC.,	Case No. 14-cv-4480-YGR			
16		PLAINTIFF TWITTER'S			
17	Plaintiff, v.	ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS 6–10 OF THE			
18 19	WILLIAM P. BARR, Attorney General of the	RUBIN DECLARATION IN SUPPORT OF TWITTER'S OPPOSITION TO DEFENDANTS' MOTION FOR			
20	United States, et al.,	SUMMARY JUDGMENT; AND IN SUPPORT OF (1) ITS CROSS-MOTION			
21	Defendants.	FOR SUMMARY JUDGMENT & (2) ITS RENEWED MOTION FOR ACCESS TO CLASSIFIED			
22		MATERIALS			
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		ADMINISTRATIVE MOTION TO FILE UNDER SEAL CASE NO. 14-CV-4480-YGR			

1	Pursuant to Northern District of California Local Civil Rules 7-11 and 79-5(e), Plaintiff	
2	Twitter, Inc. ("Twitter") respectfully requests that the Court order sealed the following exhibits t	
3	the Declaration of Lee H. Rubin submitted in support of Twitter's Opposition to Defendants'	
4	Motion for Summary Judgment; and in support of (1) its Cross-Motion for Summary Judgment &	
5	(2) its Renewed Motion for Access to Classified Materials (the "Designated Material"):	
6	• Exhibit 6;	
7	• Exhibit 7;	
8	• Exhibit 8;	
9	• Exhibit 9; and	
10	• Exhibit 10.	
11	The Designated Material contains information Defendants have designated as	
12	"CONFIDENTIAL" pursuant to the Stipulated Protective Order entered in this case on March 27,	
13	2017. Dkt. No. 170; Declaration of Lee Rubin in support of Twitter's Administrative Motion to	
14	Seal ("Rubin Sealing Decl."), ¶ 2. In accordance with that protective order and Local Civil Rules	
15	79-5(d) and (e), Twitter hereby moves to seal the Designated Material. Twitter takes no position or	
16	the propriety of Defendants' privilege designations. Rather, as required by Local Rule 79-5(e)	
17	Defendants will provide the basis for this sealing request via a separate filing.	
18	WHEREFORE, Twitter respectfully submits this administrative motion and hereby notifies	
19	Defendants of their burden to establish the Designated Material as sealable.	
20		
21	Dated: October 25, 2019 MAYER BROWN LLP	
22	_/s/ Lee H. Rubin LEE H. RUBIN	
23	Attorneys for Plaintiff Twitter, Inc.	
24	Auorneys for 1 wintig 1 witter, Inc.	
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11	Attorneys for Plaintiff Twitter, Inc.				
12					
13	UNITED STATES DISTRICT COURT				
	NORTHERN DISTRICT OF CALIFORNIA				
14	OAKLAND	DIVISION			
15	TWITTER, INC.,	Case No. 14-cv-4480-YGR			
16	D1.:4:66	DECLARATION OF LEE H. RUBIN IN			
17	Plaintiff, v.	SUPPORT OF PLAINTIFF TWITTER'S ADMINISTRATIVE MOTION TO FILE			
18	WHILLIAM D DADD AN G 1 Cd	UNDER SEAL EXHIBITS 6–10 OF THE RUBIN DECLARATION IN SUPPORT			
19	WILLIAM P. BARR, Attorney General of the United States, <i>et al.</i> ,	OF TWITTER'S OPPOSITION TO DEFENDANTS' MOTION FOR			
20		SUMMARY JUDGMENT; AND IN SUPPORT OF (1) ITS CROSS-MOTION			
21	Defendants.	FOR SUMMARY JUDGMENT & (2) ITS RENEWED MOTION FOR			
22		ACCESS TO CLASSIFIED MATERIALS			
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28		DECLARATION OF LEE H. RUBIN ISO TWITTER'S			

ADMIN. MOTION TO FILE UNDER SEAL CASE NO. 14-CV-4480-YGR

1	I, Lee H. Rubin, declare as follows:	
2	1. I am an attorney with the law firm of Mayer Brown LLP and lead counsel to	
3	Plaintiff Twitter, Inc. ("Twitter") in the above-captioned matter. I submit this declaration in support	
4	of Twitter's Administrative Motion to File Under Seal Exhibits 6–10 to the Declaration of Lee H.	
5	Rubin in support of Twitter's Opposition to Defendants' Motion for Summary Judgment; and in	
6	support of (1) its Cross-Motion for Summary Judgment & (2) its Renewed Motion for Access to	
7	Classified Materials, filed concurrently herewith. I have personal knowledge of the facts stated in	
8	this declaration and, if called as a witness, I could and would competently testify to the same.	
9	2. Specifically, Twitter requests to seal in their entirety Exhibits 6–10 to the	
10	Declaration of Lee H. Rubin submitted in support of Twitter's Opposition to Defendants' Motion	
11	for Summary Judgment, and in support of (1) its Cross-Motion for Summary Judgment and (2) its	
12	Renewed Motion for Access to Classified Materials (the "Designated Material").	
13	3. The Designated Material contains information Defendants have designated as	
14	"CONFIDENTIAL" pursuant to the Stipulated Protective Order entered in this case on March 27,	
15	2017, as Dkt. No. 170.	
16	4. Twitter takes no position on the propriety of Defendants' confidentiality	
17	designations, but files the Designated Material under seal in a good faith effort to comply with the	
18	parties' Stipulated Protective Order and the Civil Local Rules.	
19	I declare under penalty of perjury under the laws of the United States that the foregoing is	
20	true and correct.	
21	Executed on October 25, 2019 in Palo Alto, California.	
22		
23	/s/ Loo H. Puhin	
24	/s/ Lee H. Rubin Lee H. Rubin	
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1 2 3 4 5 6 7	MAYER BROWN LLP ANDREW JOHN PINCUS (<i>Pro Hac Vice</i>) apincus@mayerbrown.com 1999 K Street, NW Washington, DC 20006 Tel: (202) 263-3220 / Fax (202) 263-3300 MAYER BROWN LLP LEE H. RUBIN (SBN 141331) lrubin@mayerbrown.com DONALD M. FALK (SBN 150256) dfalk@mayerbrown.com SAMANTHA C. BOOTH (SBN 298852)				
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10 11	Tel: (650) 331-2000 / Fax (650) 331-2060 Attorneys for Plaintiff Twitter, Inc.				
12 13	UNITED STATES DISTRICT COURT				
14	NORTHERN DISTRICT OF CALIFORNIA				
15	OAKLAND DIVISION				
16	TWITTER, INC.,	Case No. 14-cv-4480-YGR			
17 18	Plaintiff, v.	[PROPOSED] ORDER GRANTING PLAINTIFF TWITTER'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS 6–10 OF THE			
19	WILLIAM P. BARR, Attorney General of the United States, <i>et al.</i> ,	RUBIN DECLARATION IN SUPPORT OF TWITTER'S OPPOSITION TO DEFENDANTS' MOTION FOR			
20 21	Defendants.	SUMMARY JUDGMENT; AND IN SUPPORT OF (1) ITS CROSS-MOTION FOR SUMMARY JUDGMENT & (2) ITS RENEWED MOTION FOR			
22		ACCESS TO CLASSIFIED MATERIALS			
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28	[PROPOSED	o] ORDER ON ADMINISTRATIVE MOTION TO SEAL CASE NO. 14-CV-4480-YGR			

1				
1	The Court having considered Plaintiff Twitter, Inc.'s Administrative Motion to File			
2	Under Seal Exhibits 6–10 of the Rubin Declaration in support of Twitter's Opposition to			
3	Defendants' Motion for Summary Judgment and in support of its Cross-Motion ("Administrative			
4	Motion"), and having received Defendants' responsive declaration as required by Civil Local			
5	Rule 79-5(e)(1), IT IS HEREBY ORDERED THAT the Administrative Motion is GRANTED .			
6	THE COURT HEREBY ORDERS that the following exhibits filed entirely under seal			
7	shall remain under seal:			
8 9	Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Order	
10	Exhibit 6	Rubin Declaration ¶ 3		
11	Exhibit 7	Rubin Declaration ¶ 3		
12	Exhibit 8	Rubin Declaration ¶ 3		
13	Exhibit 8	Rubin Deciaration 3		
14	Exhibit 9	Rubin Declaration ¶ 3		
1516	Exhibit 10	Rubin Declaration ¶ 3		
17	IT IS SO ORDERED.			
18				
19	Dated:			
20		The Hon. Yvonne Gor United States District	nzalez Rogers Judge	
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28	1 [PROPOSED] ORDER ON ADMINISTRATIVE MOTIO			
- 1		IPKUPUSEDI UKDEK UN ADI	VIINISTKATIVE MOTION	

CASE NO. 14-CV-4480-YGR